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BY _____

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UNITED STATES DISTRICT COURT
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-oOo-

UNITED STATES OF AMERICA,

Plaintiff

vs.

CONOR CLIMO,

Defendant.

COMPLAINT

Magistrate No. 2:19-mj-593-NJK

VIOLATIONS:

18 U.S.C. §§ 5841, 5861(d) and 5871 –
Possession of an Unregistered Firearm

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being duly sworn, deposes and states:

Count One

(Possession of an Unregistered Firearm)

On or about August 8, 2019,

CONOR CLIMO,

knowingly possessed firearms, specifically destructive devices, as that term is defined in Title 18
United States Code, Section 5845(f), that were not registered to him in the National Firearms

1 Registration and Transfer Record. All in violation of Title 26 United States Code, Sections
2 5841, 5861(d) and 5871.

3 AFFIANT EXPERIENCE

4 1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"),
5 and have employed by the FBI for approximately 10 years and have 5 years of experience as a
6 police officer with the York City Police Department, York Pennsylvania. I am currently
7 assigned to the Las Vegas FBI Joint Terrorism Taskforce ("JTTF") and I am responsible for
8 investigating Domestic Terrorism, including Racially Motivated Violent Extremism.

9 2. The following information contained within this criminal complaint is based
10 upon my participation in this investigation or information provided to me by other JTTF
11 members and law enforcement personnel. Because this Affidavit is being submitted for the
12 limited purpose of securing a Criminal Complaint, I have not included each and every fact
13 known to me concerning this investigation. I have set forth only those facts that I believe are
14 necessary to establish probable cause for the above listed offense. All times noted are
15 approximate.

16 PROBABLE CAUSE

17 3. In April 2019, The Las Vegas JTTF began actively investigating Conor Climo
18 ("CLIMO") based on information that CLIMO was communicating with individuals who
19 identified with the white supremacist extremist group Atomwaffen Division ("AWD"). AWD
20 is a White Supremacist Extremist Organization using the National Socialist Movement to
21 promote their ideology. AWD membership consists of mostly white males between the ages of
22 approximately 16 to 30 years of age who all believe in the superiority of the white race. AWD
23 utilizes a "Leaderless Resistance" strategy in which small independent groups, or individuals
24 called "Lone Wolves," try to achieve a common goal of challenging the established laws, social

1 order, and government via terrorism and other violent acts. AWD encourages attacks on the
2 federal government, including critical infrastructure, minorities, homosexuals, and Jews.
3 AWD works to recruit like-minded members to the organization, train them in military tactics,
4 hand to hand combat, bomb making, and other techniques in preparation for an “ultimate and
5 uncompromising victory” in a race war. Because one of AWD’s goals is to maintain
6 anonymity, members primarily communicate using online encrypted chat applications, such as
7 Wire and Discord. Wire is an encrypted communication program on which users can transmit
8 text messages and files. Discord is an application designed initially for the video gaming
9 community that specializes in text, image, video, and audio communication between users in a
10 chat channel. Both applications for Wire and Discord can be downloaded, used, and stored on
11 any computer, tablet, and cellular telephone.

12 4. In 2016, a local Las Vegas news report featured CLIMO patrolling his
13 Centennial Hills neighborhood carrying an AR-15 style assault rifle, four magazines each
14 containing 30 rounds of ammunition, and wearing a tactical vest.

15 <https://www.youtube.com/watch?v=rxIsJXDrQQ>

16 5. An open source search revealed a Quora social media account registered to
17 CLIMO. Quora is an American question-and-answer website where questions are asked,
18 answered, and edited by Internet users in the form of opinions. On January 1, 2017, CLIMO
19 answered the following question on Quora: “What are the downsides of multiculturalism?”
20 CLIMO ended his answer with the following: “To quote a Nationalist: ‘your most precious
21 possession on this earth is your people!’” This quote is from Adolph Hitler and is regularly
22 used by extremist individuals and groups. Additionally, CLIMO’S profile picture on his Quora
23 account is of an AR-15 style rifle which resembles the rifle he used in 2016 to patrol his
24

1 Centennial Hills neighborhood. As discussed below, CLIMO also used a firearm as his profile
2 picture on his Wire account.

3 6. In May 2019, an FBI confidential human source ("CHS"), who has provided
4 reliable and accurate information in the past, established contact with CLIMO on the
5 Wire.com encrypted online chat application. The CHS told CLIMO that the CHS was a "far-
6 right ally" who found a website identifying CLIMO as a member of AWD. From that point
7 on, CLIMO maintained regular contact with the CHS. CLIMO's Wire profile picture is a
8 photograph of a bolt-action rifle.

9 7. During initial conversations with the CHS, CLIMO acknowledged being in the
10 Las Vegas area and owning a Compact 92fs firearm. CLIMO discussed, in detail, how to build
11 a "Self Contained Molotov" by using "gasoline + sulfuric acid inside a Double Magnum Wine
12 Bottle."

13 8. During CLIMO's conversations with both the CHS and an FBI Online Cover
14 Employee ("OCE") CLIMO would regularly use derogatory racial, anti-Semitic, and
15 homosexual slurs.

16 9. On or about May 10, 2019, the CHS had an online conversation with CLIMO
17 during which Climo discussed setting fire to a synagogue and making Molotov Cocktails and
18 Urea Nitrate Improvised Explosive Devices ("IEDS"). CLIMO stated that in October 2017, he
19 tried to recruit a homeless person to conduct surveillance on a Las Vegas area synagogue, but
20 ultimately failed.

21 10. On May 23, 2019, an FBI OCE, with experience and training investigating
22 violent white supremacist extremist groups and individuals, established contact with user
23 CLIMO on the Wire encrypted online chat application through an introduction by the CHS.
24 During their first conversation, the FBI OCE states that he/she heard CLIMO was "someone

1 worth talking to.” CLIMO replied, “I am more interested in action than online shit.” After
2 discussing his military experience¹ with explosives and IEDS, CLIMO talked about being a
3 security guard living in Las Vegas.

4 11. The FBI OCE asked, “What are you looking to do with the group? What are
5 your goals?” CLIMO replied, “Mainly help out as best as I can & further the cause.” The FBI
6 OCE also asked, “What have you been involved with before?” CLIMO responded, “Also I live
7 in Las Vegas & have found a ADL Headquarters at 215 & Eastern.” I believe CLIMO is
8 referring to the Anti-Defamation League (“ADL”), which is an international Jewish non-
9 governmental organization based in the United States. The ADL has an office in Las Vegas.

10 12. I believe that CLIMO’s stated intent to “further the cause” references CLIMO’s
11 desire to engage in anti-Semitic and Anti-homosexual violent extremism. My opinion is based
12 on CLIMO’s discussion of the ADL and as set forth below, CLIMO’s plans for committing
13 violent attacks both on a synagogue and a bar CLIMO believe catered to homosexuals.

14 13. In another online conversation between the CLIMO and the FBI OCE, CLIMO
15 offered the book “Total Resistance” as a good guide to use when selecting a target. The book
16 explains guerrilla warfare tactics and how to implement them against an enemy. CLIMO
17 further discussed identifying a power plant as a good “soft target,” and suggested targeting
18 police leadership as “Tactical Value Targets,” and “low level political targets (as part of TAC-
19 VT).” I believe that TAC-VT is an abbreviation for tactical value targets.

20 14. On or about June 19, 2019, CLIMO talked with the CHS about various weapons.
21 During the conversation, CLIMO said, “Plus a bolt gun is good enough for me.” The CHS

22 ¹ An analysis of CLIMO’S military records showed that he greatly exaggerated his military and
23 tactical experience. CLIMO was discharged from the military after approximately 11 months
24 for actions related to not being able to perform specific required duties.

1 replied, "Oh yeah. Bolt rifles are, IMO highly under rated. Yes yes, you should keep a battle
2 rifle of some sort, but pretty much any decent caliber rifle can pop any body armor." CLIMO
3 responded, "Yea. Though groin & leg shots are good for luring combatants." Later in the
4 conversation, CLIMO stated, "Hell and White Phosphorus can be made via distilling pee. Add
5 that shit to a good mix of Tiki Torch Oil & Napalm = BBQ Kikes." The term "Kike" is a
6 derogatory racial slur used to describe members of the Jewish community

7 15. Between June 19, 2019 and July 8, 2019, during online conversations with the
8 FBI OCE, CLIMO discussed conducting surveillance on Fremont Street in Downtown Las
9 Vegas in preparation for a potential attack and described in great detail the geographical layout
10 of the area. At the beginning of the conversations, the FBI OCE asked, "Sounds like you have
11 some solid plans in place. Got any plans for a goodbye to Vegas?" CLIMO responded, "Still
12 thinking on that." The FBI OCE asked CLIMO, "You been doing any recon lately? Putting
13 the intel prep into practice?" CLIMO responded with a detailed description of an area around
14 Fremont Street in Downtown Las Vegas, specifically noting a bar that CLIMO claimed catered
15 to homosexuals.

16 16. Between July 8, 2019 and July 15, 2019, during online conversations with the
17 FBI OCE, CLIMO provided more detail about his plan to carry out an attack on a Las Vegas
18 synagogue. CLIMO first sent the FBI OCE sending screenshots of Google Maps images of
19 synagogues in the Las Vegas area. One of the images contained the message, "Also!
20 Screenshot a group of Kike Synagogue locations in Vegas." CLIMO proposed using an attack
21 against homeless people as a test run for attacks against synagogues & community centers.
22 CLIMO stated that he lived close to one of the synagogues on the map and that there was also
23 a mosque close to that synagogue.
24

1 17. CLIMO discussed attacking the synagogue close to his home. In short, CLIMO
2 proposed attacking the synagogue using an incendiary device combined with a "Light Infantry
3 Weapon Attack." CLIMO further discussed a plan for escaping after the attack and sent the
4 FBI OCE a screenshot of an image from Google Maps of a satellite image of the area around
5 the synagogue focusing on the escape route.

6 18. CLIMO also discussed his plan to ~~attach~~ ^{attack - NYC} the same synagogue with the CHS.
7 During that discussion, CLIMO described how to make an explosive device.

8 19. On August 8, 2019, the JTTF executed court authorized federal search warrants
9 at CLIMO's residence. During the search of CLIMO bedroom, which both CLIMO's aunt and
10 mother identified, FBI Special Agent Bomb Technician (SABT) Anthony Telenko located a
11 bottle of "Pot Perm Plus" Potassium Permanganate, which can be used as a strong oxidizing
12 agent, on the top shelf of CLIMO's bedroom closet. Also located on the closet shelf were
13 separate jars of thermite, sulfuric Acid and lithium aluminum hydride, which can be used as
14 fuels. SABT Telenko further observed a soldering iron, wires, circuit boards, and other
15 electrical components in CLIMO's bedroom that are consistent with items needed to construct
16 an (Improvised Explosive Device) ("IED") circuit. A green colored notebook containing
17 numerous hand drawn schematics of IED circuits was also located in CLIMO's bedroom.
18 SABT Telenko reviewed the hand drawn schematics and determined they were consistent with
19 the items and circuitry needed to function a timed explosive device.

20 20. In the garage of the house SABT Telenko located multiple large commercial
21 fireworks, empty firework "mortar" tubes, and more than five feet of hobby fuse, multiple cans
22 of brake fluid, and additional fuels. Hobby fuse is commonly used in consumer fireworks and
23 used to create a delay in fireworks or other explosives.
24

1 21. Based on SABB Telenko's training and experience he is aware that the both
2 oxidizing agents and fuels are common compounds that are used in producing Home Made
3 Explosives (HMEs). HME can be initiated by heat, shock and friction, including though the
4 ignition of a hobby fuse. By placing HMEs in items, such as empty firework mortar tubes, they
5 can be initiated with hobby fuse.

6 22. Based on SABB Telenko's training and experience, the above described item's
7 found in CLIMO's bedroom and garage could be used to readily assemble a destructive device
8 as defined in 26 U.S.C. 5845(f).

9 23. According to the Bureau of Alcohol, Tobacco, Firearms, and Explosives,
10 CLIMO has no firearms or destructive devices registered to him in the National Firearms
11 Registration and Transfer Record.

12 24. During the execution of the search warrant, CLIMO agreed to voluntarily talk
13 with me. Based on CLIMO's statements, there is significant evidence that CLIMO intended to
14 use the above described item's found in his bedroom and garage to assemble a destructive
15 device.

16 25. During the interview, CLIMO provided the following information. For several
17 years, CLIMO has studied and experimented with the making of explosive devices. CLIMO
18 harbors biases and hatred toward various racial and religious groups to include African-
19 Americans, Jews, and Homosexuals. Toward the end of 2017, CLIMO began to communicate
20 online, through the encrypted chat application Discord, with members of the Neo-Nazi group,
21 The Feuerkrieg Division ("FKD"). FKD is a splinter group of the white supremacist extremist
22 group, Atomwaffen Division ("AWD") and shares the same ideology and beliefs. For greater
23 anonymity, CLIMO and FKD began using an encrypted chat application though Wire.

1 26. CLIMO ultimately became a member of FKD because the group was interested
2 in his knowledge of constructing explosive devices, and because he was interested in and shared
3 the same white supremacy extremist views of the group. Additionally, CLIMO wanted to be a
4 part of FKD because he wanted to do something "generally different" related to his hatred of
5 African-Americans, Jews, and Homosexuals. According to CLIMO, FKD offered him glory
6 and the ability to contribute his knowledge of constructing explosive devices toward a
7 "righteous" cause. CLIMO further discussed drawing a plan and designing a bomb he
8 intended to build to assist in a race war on behalf of FKD. Ultimately, CLIMO left the online
9 FKD group because he became bored with the group and their inaction. CLIMO advised that
10 he wanted to do more against the groups he hates by carrying out violent attacks against them.

11 27. About the same time that CLIMO became involved with FKD, he also recruited
12 a homeless person to conduct surveillance on a Las Vegas synagogue to carry out an attack. In
13 this instance, CLIMO's plan did not come to fruition because he needed more time to create
14 better method of attack. CLIMO revisited this plan a few months ago around the same time he
15 realized that FKD was not going to take violent action and considered igniting the synagogue
16 on fire with people inside. One of the reasons CLIMO again thought about attacking this
17 synagogue was to make the statement, "Jews Suck." The synagogue that CLIMO identified is
18 that same Las Vegas synagogue that he talked about attacking with the CHS and FBI OCE.

19 28. CLIMO admitted talking to both the CHS and FBI OCE on using his Wire
20 encrypted application and stating that he in fact was the person using the Wire online profile
21 that talked with the CHS and FBI OCE.

22 29. After CLIMO was placed under arrest and given his *Miranda* warnings, he agreed
23 to continue to speak with agents. CLIMO further discussed the acquisition of various electronic
24 components, which he acknowledged were in his bedroom, to build a bomb or test the circuit

1 with a light bulb. CLIMO stated that fireworks found in his garage were left over from the
2 Fourth of July and he claimed that he did not possess all of the needed parts for an explosive
3 device. CLIMO further talked about a plan to mobilize an eight man sniper platoon to conduct
4 a shooting attack on Jewish people either at a Las Vegas synagogue or any other area of
5 opportunity. CLIMO explained that over approximately the past two years he has considered
6 various ideas to carry out an attack on Jewish people, but he is still trying to decide on a plan
7 that will work.

8 30. In addition to his interest in building an explosive device, CLIMO stated that he
9 had developed an interest in building a 4" mortar. In a journal found in his room, CLIMO
10 sketched a picture of an attack of a Las Vegas bar that he viewed as catering to homosexuals.
11 Additionally, in this same sketch, CLIMO drew what he described as two infantry squads
12 attacking the bar with firearms from the outside and one attacking it with a firearms from the
13 inside. This is the same Las Vegas bar that CLIMO identified to the FBI OCE as a potential
14 target of attack. Agents seized an AR-15 rifle and a bolt action rifle from CLIMO's bedroom.

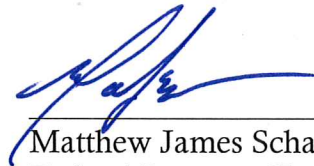
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CONCLUSION

31. Based on the above facts and circumstances, I believe there is probable cause that CLIMO did violate Title 26 United States Code, Sections 5841, 5861(d) and 5871, Possession of an Unregistered Firearm.

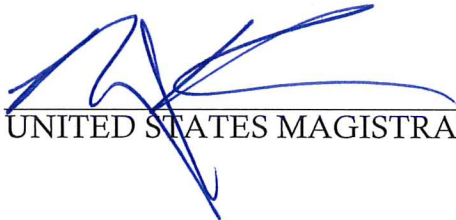
Respectfully submitted,



Matthew James Schaeffer, Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me

This 9th day of August 2019



UNITED STATES MAGISTRATE JUDGE